

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

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ANN MITCHELL,  
Plaintiff

2006 MAR 15 P 1:55

v.

CIVIL ACTION NO. 04-CV-12169-REK  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

HALLMARK HEALTH SYSTEMS/  
LAWRENCE MEMORIAL HOSPITAL  
JULIE CHASE SHAUGHNESSY  
Defendants

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**PLAINTIFF'S MOTION TO STRIKE DEFENDANT'S OPPOSITION TO PLAINTIFF'S  
MOTION TO COMPEL FURTHER PRODUCTION OF DOCUMENTS**

Plaintiff Ann Mitchell ("Plaintiff") hereby moves this Honorable Court to strike Defendant's Opposition To Plaintiff's Motion to Compel Further Production of Documents. As reasons therefore, Plaintiff states that Defendant's Opposition To Plaintiff's Motion to Compel Further Production of Documents is untimely and should be stricken. See Local Rule 37.1(c) ("The opposing party may respond to the memorandum within fourteen (14) calendar days after service thereof."). Plaintiff hereby incorporates by reference the reasons articulated in her memorandum of law attached hereto and incorporated herein by reference.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court ALLOW Plaintiff's Motion to Strike.

March 14, 2006

Respectfully submitted,  
Ann Mitchell  
By Her Attorney,

  
/s/ Alice Whitehill Wiseberg

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